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December 16, 2022

**VIA ECF**

The Honorable Valerie Figueredo  
United States Magistrate Judge  
U.S. District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 17A  
New York, New York 1007

Re: *In re Methyl Tertiary Butyl Ether (MTBE) Products Liability Litigation*, MDL  
1358  
*Commonwealth of Pennsylvania v. Exxon Mobil Corp., et al.*  
Case No. 1:14-cv-06228-VSB  
**January 11, 2023, Discovery Conference re Defendants' Motion to Compel  
Marcel Moreau Materials**

Dear Judge Figueredo:

I am writing on behalf of Plaintiff Commonwealth of Pennsylvania (the "Commonwealth") in response to the Court's December 15, 2022, Order Scheduling Discovery Conference (ECF Nos. 4744 and 899) for Wednesday, January 11, 2023, regarding the above discovery motion.

I am writing to request that the discovery conference be rescheduled as I am already scheduled to appear at an in-person hearing on another matter in Los Angeles on the same date, and will then be unavailable the rest of the week. I have conferred with counsel for the moving party, and they have confirmed that they are available anytime at the Court's convenience on January 19 or January 20, 2023, with their preferred date being January 19, if those dates are available on the Court's calendar.

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The Court's consideration is appreciated by the Commonwealth.

Respectfully Submitted,

*/s/ Tracey L. O'Reilly*

Tracey L. O'Reilly  
Miller & Axline  
Counsel for Commonwealth of Pennsylvania

cc: All Counsel (via FSX)